

ALSTON & BIRD LLP

One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

404-881-7000
Fax: 404-881-7777
www.alston.com

David M. Meezan

Direct Dial: 404-881-4346

E-mail: dmeezan@alston.com

January 27, 2005

VIA: CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tom Turner, Esq.
Associate Regional Counsel
U.S. EPA – Region V
Office of Regional Counsel (C-14J)
77 West Jackson Boulevard
Chicago, Illinois 60604



Re: RRG Clayton Chemical Site (the "Site")

Dear Mr. Turner:

This firm represents Valentec Wells, LLC ("Valentec Wells") in connection with the above-referenced Site, and all future communications with respect to this matter should be directed to my attention. I write in response to U.S. EPA's November 22 and December 23, 2004 general notice letters.

As you may recall, we spoke on January 13, 2005 concerning Valentec Wells' alleged connection to the Site. During our call, you explained that Valentec Wells is believed to be related to the Site through an alleged predecessor corporation named "Valentec Kisco." You referred me to Ms. Janet Pfundheller, with the Region V Records Center, to obtain information concerning that relationship and further information about the Site.

Since we spoke, we have contacted Ms. Pfundheller and we also have submitted a Freedom of Information Act request to obtain information concerning the Site, including the alleged corporate relationship between Valentec Wells and Valentec Kisco. To date, what we have received in response is an August 2004 Potentially Responsible Party Investigation Report for the Site, the 2002 Administrative Order by Consent for the liquids removal, and a July 2004 Liquids Removal Report, none of which provide information concerning the alleged successor relationship between Valentec Wells and Valentec Kisco.

Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
704-444-1000
Fax: 704-444-1111

90 Park Avenue
New York, NY 10016
212-210-9400
Fax: 212-210-9444

3201 Beechleaf Court, Suite 600
Raleigh, NC 27604-1062
919-862-2200
Fax: 919-862-2260

601 Pennsylvania Avenue, N.W.
North Building, 10th Floor
Washington, DC 20004-2601
202-756-3300
Fax: 202-756-3333

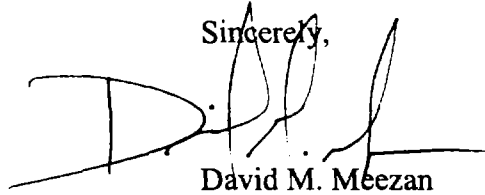
January 27, 2005

Page 2

Further, the Company's inquiry into this matter to date has not confirmed any corporate relationship between Valentec Wells and Valentec Kisco, nor has it revealed any information to indicate that Valentec Wells ever sent wastes to the Site.

Valentec Wells is continuing its internal inquiry and we again request that EPA provide any documents or information in its possession concerning the alleged corporate relationship between Valentec Wells and Valentec Kisco. In the meantime, if EPA has any questions about the Company's position in this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Meezan', with a horizontal line extending to the right.

David M. Meezan

cc: Douglas E. Cloud, Esq.
ATL01/11835000v1

U.S. ENVIRONMENTAL
PROTECTION AGENCY

JAN 17 2015

OFFICE OF REGIONAL
COUNCIL